



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**MAY 23 2018**

**URGENT LEGAL MATTER  
REQUIRES PROMPT RESPONSE**

Steven D'Agostino  
Public Works Director  
City of Woonsocket  
Woonsocket Regional Wastewater Treatment Facility  
15 Cumberland Hill Road  
Woonsocket, RI 02895

Layne Baroldi, Vice President  
Legislative and Regulatory Affairs  
Synagro  
135 Reposado Drive  
La Habra Heights, CA 90631

Re: Clean Air Act Reporting Requirement

Dear Mr. D'Agostino and Mr. Baroldi:

On May 2, 2018, the United States Environmental Protection Agency (EPA) met with officials from the City of Woonsocket (Woonsocket) and Synagro Northeast, LLC (Synagro) regarding alleged ongoing violations of 40 CFR Part 62, Subpart LLL at the Woonsocket Regional Wastewater Treatment Facility's sewage sludge incinerator.<sup>1</sup> In accordance with discussions at that meeting, EPA is requiring Woonsocket and Synagro to provide information concerning compliance with Subpart LLL.

Specifically, pursuant to Clean Air Act Section 114(a)(1), 42 U.S.C. § 7414(a)(1), EPA is requiring that for the period between January 1, 2018 and May 31, 2018, Woonsocket and Synagro submit the deviation report information required by 40 CFR § 62.16030(d) in a format that aligns with the applicable regulations, i.e., 3-hour and 12-hour block averages. Submit this information within 30 days of receipt of this Reporting Requirement.

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<sup>1</sup> On July 25, 2016, EPA issued an initial notice of violation (NOV) to Woonsocket and Synagro, and on March 27, 2018, issued a supplemental NOV for alleged violations of 40 CFR Part 62, Subpart LLL.

Note that by August 1, 2018, Woonsocket and Synagro must submit the semi-annual deviation report for the entire period between January 1, 2018, and June 30, 2018, as required by 40 CFR § 62.16030(d).

Woonsocket and Synagro shall also provide the date that it conducted its most recent annual air pollution control device inspection, required by 40 CFR § 62.16010, and a copy of the applicable air pollution control device inspection records, as required by 40 CFR § 62.16025(d). Provide this information within 30 days of receipt of this Reporting Requirement.

Provide one hard copy of your response and an electronic copy, with the spreadsheet in an unlocked electronic spreadsheet format (preferably in Microsoft Excel). Be aware that if Woonsocket and Synagro do not provide the information required in this Reporting Requirement in a timely manner, EPA may order them to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Karen McGuire, Acting Director  
Office of Environmental Stewardship  
U.S. Environmental Protection Agency, Region I  
Mail Code OES04-2  
5 Post Office Square Suite 100  
Boston, Massachusetts, 02109-3912  
Attn: Joan M. Jouzaitis

If you have any questions regarding this Reporting Requirement, please contact Joan Jouzaitis at (617) 918-1846 or have your attorney call Tahani Rivers at (617) 918-1299.

Sincerely,



Karen McGuire, Acting Director  
Office of Environmental Stewardship

cc: Chris John, RIDEM  
Dave Chopy, RIDEM